

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**D & D Brake Sales, Inc.
State Road 234 and Mohawk Road
Fortville, Indiana 46040**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T059-9982-00012	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary brake shoe manufacturing facility.

Responsible Official:	Robert Thompson
Source Address:	State Road 234 and Mohawk Road, Fortville, Indiana 46040
Mailing Address:	P.O. Box 160, Fortville, Indiana 46040
Phone Number:	(317) 485-5177
SIC Code:	3069, 7539
County Location:	Hancock
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD Rules;
	Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) Pangborn shot blasting systems, identified as #1 and 2, each constructed in 1992, each with a maximum capacity of blasting 700 pounds of brake shoes per hour, both utilizing one (1) baghouse (ID #1) for particulate control, exhausting through one (1) stack ID # 1;
- (b) Four (4) grinders, identified as # 1, 2, 3, and 4, each constructed in 1992, each with a maximum grinding rate of 350 pounds per hour, all utilizing one (1) baghouse (ID #2) and a HEPA filter for particulate control, exhausting through one (1) stack ID #2;
- (c) One (1) deliner chopper, constructed in 1992, with a maximum throughput capacity of 1,875 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3;
- (d) Two (2) dip tanks, identified as primary and secondary, each constructed in 1992, each with a maximum throughput rate of 1.929 gallons per hour. The secondary dip tank is only used when the primary dip tank is not working; and
- (e) One (1) propane storage tank, identified as #1, constructed in 1992, with a maximum storage capacity of 15,042 gallons.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1 (21) that do not have applicable requirements.

- (a) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million British thermal units (MMBtu) per hour:
 - (1) One (1) burnoff oven, constructed in 1992, with a maximum heat input rate of 0.75 MMBtu per hour, exhausting through stack ID # 7;
 - (2) Three (3) bonding ovens, identified as #1, 2, and 3, each constructed in 1992, each with a maximum heat input rate of 0.5 MMBtu per hour, each exhausting through stacks # 5, 4, and 6, respectively;
- (b) Vessel storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (e) Paved and unpaved roads and parking lots with public access; and
- (f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting, pneumatic conveying, and woodworking activities.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

B.1 Permit No Defense [IC 13]

- ## B.2 Definitions [326 IAC 2-7-1]

B.3 Permit Term [326 IAC 2-7-5(2)]

B.4 Enforceability [326 IAC 2-7-7(a)]

- ## B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

B.6 Severability [326 IAC 2-7-5(5)]

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).
- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Two (2) dip tanks, identified as primary and secondary, each constructed in 1992, with a combined maximum throughput rate of 1.929 gallons per hour. The secondary dip tank is only used when the primary dip tank is not working.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at each of the dip tanks shall be limited to 4.3 pounds of VOCs per gallon of coating less water, for clear coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The requirement from CP-059-2668-00012, issued on October 21, 1992, Operating Condition #5, that establishes that volatile organic compound (VOC) emissions from the secondary dip tank shall be limited to 15 pounds per day is not applicable because the secondary dip tank will only be used if the primary dip tank is not in use. Both tanks shall be subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating).

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;

- (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) Two (2) Pangborn shot blasting systems, identified as #1 and 2, each constructed in 1992, each with a maximum capacity of blasting 700 pounds of brake shoes per hour, both utilizing one (1) baghouse (ID #1) for particulate control, exhausting through one (1) stack ID # 1;
- (b) Four (4) grinders, identified as # 1, 2, 3, and 4, each constructed in 1992, each with a maximum grinding rate of 350 pounds per hour, all utilizing one (1) baghouse (ID #2) and a HEPA filter for particulate control, exhausting through one (1) stack ID #2;
- (c) One (1) deliner chopper, constructed in 1992, with a maximum throughput capacity of 1,875 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the two (2) Pangborn shot blasting systems shall not exceed 3.23 pounds per hour when operating at a combined process weight rate of 1,400 pounds per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the four (4) grinders shall not exceed 3.23 pounds per hour when operating at a combined process weight rate of 1,400 pounds per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the deliner chopper shall not exceed 3.93 pounds per hour when operating at a process weight rate of 1,875 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

- (d) The requirement from CP-059-2477-00012, issued on August 26, 1992, Operating Condition #4, that establishes that particulate matter (PM) emissions shall be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 20% opacity is not applicable because facilities that discharge asbestos have opacity limitation standards pursuant to 326 IAC 14-2-1, (40 CFR 61.140, Subpart M).
- (e) The requirement from CP-059-2668-00012, issued on October 21, 1992, Operating Condition #5, that establishes that particulate matter (PM) emissions shall be limited to 0.015 grains per actual cubic feet (gr/acf) at the outlet of the fan discharge for the dust collectors for the grinding and the shotblasting operations and that PM emissions will be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 10% opacity is not applicable. The allowable PM emission rate has been established pursuant to 326 IAC 6-3-2 (Process Operations) and facilities that discharge asbestos have opacity limitation standards pursuant to 326 IAC 14-2-1, (40 CFR 61.140, Subpart M).

D.2.2 National Emission Standards for Asbestos [326 IAC 14-2-1] [40 CFR 61.140]

The following requirements of this subpart shall be met for those facilities that discharge asbestos:

- (a) Each owner or operator shall discharge no visible emissions to the outside air from these operations or from any building or structure in which they are conducted.
- (b) Monitoring each potential source of asbestos emissions from visible emissions at least once a day.
- (c) Inspecting each air cleaning device at least once each week for proper operation.
- (d) Maintaining records of monitoring and inspections using a format similar to Figure 1 and 2 in 40 CFR 61.142, Subpart M.
- (e) Furnishing upon request and/or making available the records for inspection by OAM.
- (f) Retaining a copy of all monitoring and inspection records for at least two years.
- (g) Submitting a copy of the monitoring records if visible emissions occurred during the report period.
- (h) Meeting the waste disposal requirements.

40 CFR 61.150 (Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations)

Each owner or operator of any source covered under the provisions of 40 CFR 61.144, 40 CFR 61.145, 40 CFR 61.146, and 40 CFR 61.147 shall comply with the following provisions:

- (1) Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by the source, or use one of the emission control and waste treatment methods specified in paragraphs (1) (i) through (iv) of this section.
 - (i) Adequately wet asbestos-containing waste material as follows:
 - (A) Mix control device asbestos waste to form a slurry; adequately wet other asbestos-containing waste material; and

- (B) Discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations, or use the methods specified by 40 CFR 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air; and
 - (C) After wetting, seal all asbestos-containing waste material in leak-tight containers while wet; or, for materials that will not fit into containers without additional breaking, put materials into leak-tight wrapping; and
 - (D) Label the containers or wrapped materials specified in paragraph (a)(1)(iii) of this section using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(2) or 1926.58(k)(2)(iii). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.
 - (E) For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.
- (ii) Process asbestos-containing waste material into nonfriable forms as follows:
- (A) Form all asbestos-containing waste material into nonfriable pellets or other shapes;
 - (B) Discharge no visible emissions to the outside air from collection and processing operations, including incineration, or use the method specified by 40 CFR 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air.
- (iii) For facilities demolished where the RACM is not removed prior to demolition according to 40 CFR 61.145(c)(1) (i), (ii), (iii), and (iv) or for facilities demolished according to 40 CFR 61.145(c)(9), adequately wet asbestos-containing waste material at all times after demolition and keep wet during handling and loading for transport to a disposal site. Asbestos-containing waste materials covered by this paragraph do not have to be sealed in leak-tight containers or wrapping but may be transported and disposed of in bulk.
- (iv) Use an alternative emission control and waste treatment method that has received prior approval by the Administrator according to the procedure described in 40 CFR 61.149(c)(2).
- (v) As applied to demolition and renovation, the requirements of paragraph (1) of this section do not apply to Category I nonfriable ACM waste and Category II nonfriable ACM waste that did not become crumbled, pulverized, or reduced to powder.
- (2) All asbestos-containing waste material shall be deposited as soon as is practical by the waste generator at:
- (i) A waste disposal site operated in accordance with the provisions of 40 CFR 61.154, or
 - (ii) An EPA-approved site that converts RACM and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of 40 CFR 61.155.
 - (iv) The requirements of paragraph (2) of this section do not apply to Category I nonfriable ACM that is not RACM.

- (3) Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 40 CFR 61.149(d)(1) (i), (ii), and (iii).
- (4) For all asbestos-containing waste material transported off the facility site:
 - (i) Maintain waste shipment records, using a form similar to that shown in Figure 4, and include the following information:
 - (A) The name, address, and telephone number of the waste generator.
 - (B) The name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program.
 - (C) The approximate quantity in cubic meters (cubic yards).
 - (D) The name and telephone number of the disposal site operator.
 - (E) The name and physical site location of the disposal site.
 - (F) The date transported.
 - (G) The name, address, and telephone number of the transporter(s).
 - (H) A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.
 - (ii) Provide a copy of the waste shipment record, described in paragraph (4)(i) of this section, to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.
 - (iii) For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.
 - (iv) Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. Include in the report the following information:
 - (A) A copy of the waste shipment record for which a confirmation of delivery was not received, and
 - (B) A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.
 - (v) Retain a copy of all waste shipment records, including a copy of the waste shipment record signed by the owner or operator of the designated waste disposal site, for at least 2 years.
- (5) Furnish upon request, and make available for inspection by the Administrator, all records required under this section.

- (i) Meeting the requirements of Section 61.152 (Air Cleaning) and 61.153 (Reporting).
 - 40 CFR 61.152 (Air-cleaning)
 - (1) The owner or operator who uses air cleaning, as specified in 40 CFR 61.142(a), 40 CFR 61.144(b)(2), 40 CFR 61.145(c)(3)(i)(B)(1), 40 CFR 61.145(c)(4)(ii), 40 CFR 61.145(c)(11)(i), 40 CFR 61.146(b)(2), 40 CFR 61.147(b)(2), 40 CFR 61.149(b), 40 CFR 61.149(c)(1)(ii), 40 CFR 61.150(a)(1)(ii), 40 CFR 61.150(a)(2)(ii), and 40 CFR 61.155(e) shall:
 - (i) Use fabric filter collection devices, except as noted in paragraph (ii) of this section, doing all of the following:
 - (A) Ensuring that the airflow permeability, as determined by ASTM Method D737-75, does not exceed 9 m³/min/m² (30 ft³/min/ft²) for woven fabrics or 113/min/m²(35 ft³/min/ft²) for felted fabrics, except that 12 m³/min/m² (40 ft³min/ft²) for woven and 14 m³/min/m² (45 ft 3min/ft²) for felted fabrics is allowed for filtering air from asbestos ore dryers; and
 - (B) Ensuring that felted fabric weighs at least 475 grams per square meter (14 ounces per square yard) and is at least 1.6 millimeters (one-sixteenth inch) thick throughout; and
 - (C) Avoiding the use of synthetic fabrics that contain fill yarn other than that which is spun.
 - (ii) Properly install, use, operate, and maintain all air-cleaning equipment authorized by this section. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material.
 - (iii) For fabric filter collection devices installed after January 10, 1989, provide for easy inspection for faulty bags.
 - (2) There are the following exceptions to paragraph (i)(A):
 - (i) After January 10, 1989, if the use of fabric creates a fire or explosion hazard, or the Administrator determines that a fabric filter is not feasible, the Administrator may authorize as a substitute the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals (40 inches water gage pressure).
 - (ii) Use a HEPA filter that is certified to be at least 99.97 percent efficient for 0.3 micron particles.
 - (iii) The Administrator may authorize the use of filtering equipment other than described in paragraphs (i)(A) and (2)(i) and (ii) of this section if the owner or operator demonstrates to the Administrator's satisfaction that it is equivalent to the described equipment in filtering particulate asbestos material.

40 CFR 61.153 (Reporting)

- (1) Any new source to which this subpart applies (with the exception of sources subject to 40 CFR 61.143, 40 CFR 61.145, 40 CFR 61.146, and 40 CFR 61.148), which has an initial startup date preceding the effective date of this revision, shall provide the following information to the Administrator postmarked or delivered within 90 days of the effective date. In the case of a new source that does not have an initial startup date preceding the effective date, the information shall be provided, postmarked or delivered, within 90 days of the initial startup date. Any owner or operator of an existing source shall provide the following information to the Administrator within 90 days of the effective date of this subpart unless the owner or operator of the existing source has previously provided this information to the Administrator. Any changes in the information provided by any existing source shall be provided to the Administrator, postmarked or delivered, within 30 days after the change.
 - (i) A description of the emission control equipment used for each process; and
 - (A) If the fabric device uses a woven fabric, the airflow permeability in m³/min/m² and; if the fabric is synthetic, whether the fill yarn is spun or not spun; and
 - (B) If the fabric filter device uses a felted fabric, the density in g/m², the minimum thickness in inches, and the airflow permeability in m³/min/m².
 - (ii) If a fabric filter device is used to control emissions,
 - (A) The airflow permeability in m³/min/m² (ft³/min/ft²) if the fabric filter device uses a woven fabric, and, if the fabric is synthetic, whether the fill yarn is spun or not spun; and
 - (B) If the fabric filter device uses a felted fabric, the density in g/m² (oz/yd²), the minimum thickness in millimeters (inches), and the airflow permeability in m³/min/m² (ft³/min/ft²).
 - (iii) If a HEPA filter is used to control emissions, the certified efficiency.
 - (iv) For sources subject to 40 CFR 61.149 and 40 CFR 61.150:
 - (A) A brief description of each process that generates asbestos-containing waste material; and
 - (B) The average volume of asbestos-containing waste material disposed of, measured in m³/day (yd³/day); and
 - (C) The emission control methods used in all stages of waste disposal; and
 - (D) The type of disposal site or incineration site used for ultimate disposal, the name of the site operator, and the name and location of the disposal site.
 - (v) For sources subject to 40 CFR 61.151 and 40 CFR 61.154:
 - (A) A brief description of the site; and
 - (B) The method or methods used to comply with the standard, or alternative procedures to be used.
- (2) The information required by paragraph (1) of this section must accompany the information required by 40 CFR 61.10. Active waste disposal sites subject to 40 CFR 61.154 shall also comply with this provision. Roadways, demolition and renovation, spraying, and insulating materials are exempted from the requirements of 40 CFR 61.10(a). The information described in this section must be reported using the format of appendix A of this part as a guide.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

Pursuant to CP 059-2477-00012, issued on August 26, 1992 and CP 059-2668-00012, issued on October 21, 1992, the baghouses for PM control shall be in operation at all times when the two (2) Pangborn shot blasting systems, the four (4) grinders, and the deliner chopper are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the two (2) Pangborn shot blasting system, four (4) grinder, and deliner chopper stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the two (2) Pangborn shot blasting systems, four (4) grinders, and deliner chopper, at least once weekly when the two (2) Pangborn shot blasting systems, four (4) grinders, and deliner chopper are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the two (2) Pangborn shot blasting systems, four (4) grinders, and deliner chopper. All defective bags shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the two (2) Pangborn shot blasting system, four (4) grinders, and deliner chopper stack exhaust.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.

- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) propane storage tank, identified as #1, constructed in 1992, with a maximum storage capacity of 15,042 gallons.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Liquid Storage Vessel [326 IAC 12][40 CFR 60.110, Subpart Kb]

Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the one (1) tank, with a design capacity of less than 75 cubic meters, is subject to 40 CFR Part 60.116b, paragraphs (a) and (b) which require record keeping.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements [326 IAC 12]

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain permanent records at the source in accordance with (1) and (2) below for the one (1) tank:
 - (1) The dimension of the storage vessel; and
 - (2) An analysis showing the capacity of the storage vessel;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: D & D Brake Sales, Inc.
Source Address: State Road 234 and Mohawk Road, Fortville, Indiana 46040
Mailing Address: P.O. Box 160, Fortville, Indiana 46040
Part 70 Permit No.: T059-9982-00012

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: D & D Brake Sales, Inc.
Source Address: State Road 234 and Mohawk Road, Fortville, Indiana 46040
Mailing Address: P.O. Box 160, Fortville, Indiana 46040
Part 70 Permit No.: T059-9982-00012

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: D & D Brake Sales, Inc.
Source Address: State Road 234 and Mohawk Road, Fortville, Indiana 46040
Mailing Address: P.O. Box 160, Fortville, Indiana 46040
Part 70 Permit No.: T059-9982-00012

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: D & D Brake Sales, Inc.
Source Location: State Road 234 and Mohawk Road, Fortville, Indiana 46040
County: Hancock
SIC Code: 3069, 7539
Operation Permit No.: T059-9982-00012
Permit Reviewer: Yvette de los Angeles/EVP

On July 3, 1999, the Office of Air Management (OAM) had a notice published in the Daily Reporter, Greenfield, Indiana, stating that D & D Brake Sales, Inc. had applied for a Part 70 Operating Permit for the operation of brake shoe manufacturing facility. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 2, 1999, Kathryn Stowring and Charles Staehler of August Mack Environmental, Inc., submitted comments on behalf of D & D Brake Sales, Inc. on the proposed Part 70 permit. The summary of the comments and corresponding responses are as follows (changes in bold or strikeout for emphasis):

Comment 1:

In Sections A.2.a, D.2.1, D.2.5, D.2.6, D.2.7, D.2.8, D.2.10 of the permit and the TSD, Pangborn, not wheelabrator, manufactured the shot blast machines.

Response 1:

Section A.2.a of the permit has been revised as follows to list the correct shotblast manufacturer:

- (a) Two (2) ~~Wheelabrator~~ **Pangborn** shot blasting systems, identified as #1 and 2, each constructed in 1992, each with a maximum capacity of blasting 700 pounds of brake shoes per hour, both utilizing one (1) baghouse (ID #1) for particulate control, exhausting through one (1) stack ID # 1;

Condition D.2.1 of the permit has been revised as follows:

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the two (2) ~~Wheelabrator~~ **Pangborn** shot blasting systems shall not exceed 3.23 pounds per hour when operating at a combined process weight rate of 1,400 pounds per hour.

Condition D.2.5 of the permit has been revised as follows:

Pursuant to CP 059-2477-00012, issued on August 26, 1992 and CP 059-2668-00012, issued on October 21, 1992, the baghouses for PM control shall be in operation at all times when the two (2) ~~Wheelabrator~~ **Pangborn** shot blasting systems, the four (4) grinders, and the deliner chopper are in operation.

Condition D.2.6 of the permit has been revised as follows:

- (a) Daily visible emission notations of the two (2) ~~Wheelabrator~~ **Pangborn** shot blasting system, four (4) grinder, and deliner chopper stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Condition D.2.7 of the permit has been revised as follows:

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the two (2) ~~Wheelabrator~~ **Pangborn** shot blasting systems, four (4) grinders, and deliner chopper, at least once weekly when the two (2) ~~Wheelabrator~~ **Pangborn** shot blasting systems, four (4) grinders, and deliner chopper are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

Condition D.2.8 of the permit has been revised as follows:

An inspection shall be performed each calendar quarter of all bags controlling the two (2) ~~Wheelabrator~~ **Pangborn** shot blasting systems, four (4) grinders, and deliner chopper when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Condition D.2.10 of the permit has been revised as follows:

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the two (2) ~~Wheelabrator~~ **Pangborn** shot blasting system, four (4) grinders, and deliner chopper stack exhaust.

Comment 2:

In Section A.3 of the permit, the following insignificant activities at the source should be added, pursuant to 326 IAC 2-7-1(21):

- (a) one (1) burnoff oven.
- (b) three (3) bonding ovens.
- (c) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (d) application of oils, greases, lubricant or other nonvolatile materials applied as temporary protective coatings.
- (e) replacement or repair of electrostatic precipitators, bags in baghouses and filters on other air filtration equipment.
- (f) Paved and unpaved roads and parking lots with public access.
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute.

Response 2:

While the Title V Operating Permit rule requires that applications list all points of emissions (326 IAC 2-7-4 Permit Application) with additional provisions relating to insignificant and trivial activities (326 IAC 2-7-1 Definitions), the rule requires that the permit identify all applicable requirements (326 IAC 2-7-5 Permit Content). The OAM ordinarily includes insignificant activities only as necessary to identify specific applicable requirements. During the development of the model Title V Operating Permit and the subsequent implementation of the program, this approach has been the consensus recommendation of both the regulated community and the OAM. In many cases, future additions or deletions of insignificant activities will not require a modification of this permit. It was felt that there would be less confusion if the permit did not give the impression that the rules required every insignificant activity to be listed in the permit. Nonetheless, the OAM has added these activities to this permit in response to your request. This has no effect on future activities regarding insignificant activities. The changes to the permit are as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source ~~does not currently have any~~ **also consists of the following** insignificant activities, as defined in 326 IAC 2-7-1 (21) that **do not** have applicable requirements.

- (a) **Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million British thermal units (MMBtu) per hour:**
 - (1) **One (1) burnoff oven, constructed in 1992, with a maximum heat input rate of 0.75 MMBtu per hour, exhausting through stack ID # 7;**
 - (2) **Three (3) bonding ovens, identified as #1, 2, and 3, each constructed in 1992, each with a maximum heat input rate of 0.5 MMBtu per hour, each exhausting through stacks # 5, 4, and 6, respectively;**
- (b) **Vessel storing lubricating oils, hydraulic oils, machining oils, and machining fluids;**
- (c) **Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;**
- (d) **Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;**
- (e) **Paved and unpaved roads and parking lots with public access; and**
- (f) **Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting, pneumatic conveying, and woodworking activities.**

Comment 3:

In Condition D.1 of the permit, the maximum capacity of the primary dip tank is 1.929 gallons of the mixture per hour. The combined capacity of the primary and secondary dip tanks is 3.858 gallons of the mixture per hour. The secondary tank is only used when the primary dip tank is not working.

Response 3:

The following changes have been made to Section A.2 and the Emission Unit Description in Section D.1 of the permit:

Two (2) dip tanks, identified as primary and secondary, each constructed in 1992, **each** with a maximum throughput rate of **4 1.929** gallons per hour. The secondary dip tank is only used when the primary dip tank is not working; and

Comment 4:

In Condition D.1.4(a)(5) of the permit, please revise the current phrase to read as "The weight of the VOCs emitted for each month."

Response 4:

The source needs to keep records of the amount of each coating material and solvent used to show compliance with 326 IAC 8-2-11 for coatings as applied to the coating applicator. The data on cleanup solvent usage needs to be kept to differentiate the amount of solvent added to the coatings and the total solvent used. It can be used as a backup to document that compliant coatings are delivered to the coating applicator. The following changes have been made to Condition D.1.4(a)(5) of the permit to clarify the length of the compliance period:

- (5) The weight of VOCs emitted for each ~~compliance period~~ **month**.

Comment 5:

In Condition D.2.1 of the permit, the deliner chopper has a maximum throughput of 1,875 pounds per hour. Each brake shoe weighs approximately 1 pound. The deliner chopper has a maximum capacity of 1,875 brake shoes per hour which is equivalent to 1,875 pounds per hour. As a result, the allowable particulate emission rate from the deliner chopper shall not exceed 3.93 pounds per hour when operating at a process weight rate of 1,875 pounds per hour.

Response 5:

The following changes have been made to Condition D.2.1 of the permit to correct the allowable PM emission rate and to state the correct the process weight rate for the deliner chopper:

- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the deliner chopper shall not exceed ~~3.23~~ **3.93** pounds per hour when operating at a process weight rate of ~~1,400~~ **1,875** pounds per hour.

Comment 6:

In Condition D.2.2, (d) After reviewing 40 CFR 61.140, Figures 1 and 2 were not found. To ensure compliance with Condition D.2.2, please confirm the locations of Figures 1 and 2 as 40 CFR 61.142. To ensure compliance with Condition D.2.2(h), please describe in detail the waste disposal requirements which are applicable to the D & D source. To ensure compliance with Condition D.2.2(i), please describe in detail the requirements of Section 61.152 and 61.153 which are applicable to the D & D source.

Response 6:

The requested Sections Section 40 CFR 61.150, 40 CFR 61.152 and 40 CFR 61.153 of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 12, (40 CFR 61.140, Subpart M) have been restated in order to allow application to affected facilities. Portions of the NSPS that do not apply, have been met, and/or performed may be ignored. The following changes have been made to Condition D.2.2:

- (d) Maintaining records of monitoring and inspections using a format similar to Figure 1 and 2 in 40 CFR ~~61.140~~ **61.142**, Subpart M.

- (h) Meeting the waste disposal requirements.
- 40 CFR 61.150 (Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations)**
- Each owner or operator of any source covered under the provisions of 40 CFR 61.144, 40 CFR 61.145, 40 CFR 61.146, and 40 CFR 61.147 shall comply with the following provisions:**
- (1) Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by the source, or use one of the emission control and waste treatment methods specified in paragraphs (1) (i) through (iv) of this section.
- (i) Adequately wet asbestos-containing waste material as follows:
- (A) Mix control device asbestos waste to form a slurry; adequately wet other asbestos-containing waste material; and
- (B) Discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations, or use the methods specified by 40 CFR 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air; and
- (C) After wetting, seal all asbestos-containing waste material in leak-tight containers while wet; or, for materials that will not fit into containers without additional breaking, put materials into leak-tight wrapping; and
- (D) Label the containers or wrapped materials specified in paragraph (a)(1)(iii) of this section using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(2) or 1926.58(k)(2)(iii). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.
- (E) For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.
- (ii) Process asbestos-containing waste material into nonfriable forms as follows:
- (A) Form all asbestos-containing waste material into nonfriable pellets or other shapes;
- (B) Discharge no visible emissions to the outside air from collection and processing operations, including incineration, or use the method specified by 40 CFR 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air.

- (iii) For facilities demolished where the RACM is not removed prior to demolition according to 40 CFR 61.145(c)(1) (i), (ii), (iii), and (iv) or for facilities demolished according to 40 CFR 61.145(c)(9), adequately wet asbestos-containing waste material at all times after demolition and keep wet during handling and loading for transport to a disposal site. Asbestos-containing waste materials covered by this paragraph do not have to be sealed in leak-tight containers or wrapping but may be transported and disposed of in bulk.
 - (iv) Use an alternative emission control and waste treatment method that has received prior approval by the Administrator according to the procedure described in 40 CFR 61.149(c)(2).
 - (v) As applied to demolition and renovation, the requirements of paragraph (1) of this section do not apply to Category I nonfriable ACM waste and Category II nonfriable ACM waste that did not become crumbled, pulverized, or reduced to powder.
- (2) All asbestos-containing waste material shall be deposited as soon as is practical by the waste generator at:
 - (i) A waste disposal site operated in accordance with the provisions of 40 CFR 61.154, or
 - (ii) An EPA-approved site that converts RACM and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of 40 CFR 61.155.
 - (iv) The requirements of paragraph (2) of this section do not apply to Category I nonfriable ACM that is not RACM.
- (3) Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 40 CFR 61.149(d)(1) (i), (ii), and (iii).
- (4) For all asbestos-containing waste material transported off the facility site:
 - (i) Maintain waste shipment records, using a form similar to that shown in Figure 4, and include the following information:
 - (A) The name, address, and telephone number of the waste generator.
 - (B) The name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program.
 - (C) The approximate quantity in cubic meters (cubic yards).
 - (D) The name and telephone number of the disposal site operator.
 - (E) The name and physical site location of the disposal site.
 - (F) The date transported.
 - (G) The name, address, and telephone number of the transporter(s).
 - (H) A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

- (ii) Provide a copy of the waste shipment record, described in paragraph (4)(i) of this section, to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.
 - (iii) For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.
 - (iv) Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. Include in the report the following information:
 - (A) A copy of the waste shipment record for which a confirmation of delivery was not received, and
 - (B) A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.
 - (v) Retain a copy of all waste shipment records, including a copy of the waste shipment record signed by the owner or operator of the designated waste disposal site, for at least 2 years.
 - (5) Furnish upon request, and make available for inspection by the Administrator, all records required under this section.
- (i) Meeting the requirements of Section 61.152 (Air Cleaning) and 61.153 (Reporting).
- 40 CFR 61.152 (Air-cleaning)**
- (1) The owner or operator who uses air cleaning, as specified in 40 CFR 61.142(a), 40 CFR 61.144(b)(2), 40 CFR 61.145(c)(3)(i)(B)(1), 40 CFR 61.145(c)(4)(ii), 40 CFR 61.145(c)(11)(i), 40 CFR 61.146(b)(2), 40 CFR 61.147(b)(2), 40 CFR 61.149(b), 40 CFR 61.149(c)(1)(ii), 40 CFR 61.150(a)(1)(ii), 40 CFR 61.150(a)(2)(ii), and 40 CFR 61.155(e) shall:
 - (i) Use fabric filter collection devices, except as noted in paragraph (ii) of this section, doing all of the following:
 - (A) Ensuring that the airflow permeability, as determined by ASTM Method D737-75, does not exceed 9 m³/min/m² (30 ft³/min/ft²) for woven fabrics or 113 m³/min/m² (35 ft³/min/ft²) for felted fabrics, except that 12 m³/min/m² (40 ft³/min/ft²) for woven and 14 m³/min/m² (45 ft³/min/ft²) for felted fabrics is allowed for filtering air from asbestos ore dryers; and
 - (B) Ensuring that felted fabric weighs at least 475 grams per square meter (14 ounces per square yard) and is at least 1.6 millimeters (one-sixteenth inch) thick throughout; and
 - (C) Avoiding the use of synthetic fabrics that contain fill yarn other than that which is spun.
 - (ii) Properly install, use, operate, and maintain all air-cleaning equipment authorized by this section. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material.

- (iii) For fabric filter collection devices installed after January 10, 1989, provide for easy inspection for faulty bags.
- (2) There are the following exceptions to paragraph (i)(A):
 - (i) After January 10, 1989, if the use of fabric creates a fire or explosion hazard, or the Administrator determines that a fabric filter is not feasible, the Administrator may authorize as a substitute the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals (40 inches water gage pressure).
 - (ii) Use a HEPA filter that is certified to be at least 99.97 percent efficient for 0.3 micron particles.
 - (iii) The Administrator may authorize the use of filtering equipment other than described in paragraphs (i)(A) and (2)(i) and (ii) of this section if the owner or operator demonstrates to the Administrator's satisfaction that it is equivalent to the described equipment in filtering particulate asbestos material.

40 CFR 61.153 (Reporting)

- (1) Any new source to which this subpart applies (with the exception of sources subject to 40 CFR 61.143, 40 CFR 61.145, 40 CFR 61.146, and 40 CFR 61.148), which has an initial startup date preceding the effective date of this revision, shall provide the following information to the Administrator postmarked or delivered within 90 days of the effective date. In the case of a new source that does not have an initial startup date preceding the effective date, the information shall be provided, postmarked or delivered, within 90 days of the initial startup date. Any owner or operator of an existing source shall provide the following information to the Administrator within 90 days of the effective date of this subpart unless the owner or operator of the existing source has previously provided this information to the Administrator. Any changes in the information provided by any existing source shall be provided to the Administrator, postmarked or delivered, within 30 days after the change.
 - (i) A description of the emission control equipment used for each process; and
 - (A) If the fabric device uses a woven fabric, the airflow permeability in m³/min/m² and; if the fabric is synthetic, whether the fill yarn is spun or not spun; and
 - (B) If the fabric filter device uses a felted fabric, the density in g/m², the minimum thickness in inches, and the airflow permeability in m³/min/m².
 - (ii) If a fabric filter device is used to control emissions,
 - (A) The airflow permeability in m³/min/m² (ft³/min/ft²) if the fabric filter device uses a woven fabric, and, if the fabric is synthetic, whether the fill yarn is spun or not spun; and
 - (B) If the fabric filter device uses a felted fabric, the density in g/m² (oz/yd²), the minimum thickness in millimeters (inches), and the airflow permeability in m³/min/m² (ft³/min/ft²).
 - (iii) If a HEPA filter is used to control emissions, the certified efficiency.
 - (iv) For sources subject to 40 CFR 61.149 and 40 CFR 61.150:
 - (A) A brief description of each process that generates asbestos-containing waste material; and
 - (B) The average volume of asbestos-containing waste material disposed of, measured in m³/day (yd³/day); and

- (C) The emission control methods used in all stages of waste disposal; and
- (D) The type of disposal site or incineration site used for ultimate disposal, the name of the site operator, and the name and location of the disposal site.
- (v) For sources subject to 40 CFR 61.151 and 40 CFR 61.154:
 - (A) A brief description of the site; and
 - (B) The method or methods used to comply with the standard, or alternative procedures to be used.
- (2) The information required by paragraph (1) of this section must accompany the information required by 40 CFR 61.10. Active waste disposal sites subject to 40 CFR 61.154 shall also comply with this provision. Roadways, demolition and renovation, spraying, and insulating materials are exempted from the requirements of 40 CFR 61.10(a). The information described in this section must be reported using the format of appendix A of this part as a guide.

Comment 7:

In Condition D.2.8 of the permit, the baghouse controlling the two shot blast machines, four grinders, and deliner chopper are already vented to the atmosphere. Please remove the sentence stating "A baghouse inspection shall be performed withing three months of redirecting vents to the atmosphere and every three months thereafter."

Response 7:

The sentence stating "A baghouse inspection shall be performed withing three months of redirecting vents to the atmosphere and every three months thereafter." is unnecessary as all of the emission units in Section D.2 vent to the atmosphere. Condition D.2.8 has been modified as follows:

An inspection shall be performed each calender quarter of all bags controlling the two (2) Wheelabrator shot blasting systems, four (4) grinders, and deliner chopper. ~~when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~ All defective bags shall be replaced.

Comment 8:

In Condition D.2.10(b) of the permit:

- (a) Please strike out the words "differential pressure" since the differential pressure is already required within D.2.10 (b)(1)(A). Also, please delete the requirement to monitor the frequency of cleaning. The data does not ensure that the collector is operating properly. It would be extremely labor intensive to record each time the collector went through a cleaning cycle.
- (b) To ensure compliance, please describe in detail the information required in the Quality Assurance/ Quality Control (QA/QC) procedures.
- (c) To ensure compliance, please describe in detail the meaning of "Manufacturer's specifications or its equivalent" and with respect to which piece of equipment this phrase is referring.
- (d) Please remove the statement "Documentation of the dates vents are redirected" since the vents are already directed to the atmosphere.

Response 8:

- (a) The OAM has decided that records of differential pressure and cleaning cycle are both important factors in assessing whether the baghouses are operating properly. A brief assessment of the cleaning cycle can be made in conjunction with the weekly check of pressure drops. Therefore, there has been no change to Condition D.2.10(b)(1)(B).
- (b) Condition D.2.10(b)(4) is in reference to pressure gauges or other equipment used in complying with compliance monitoring requirements. For example, the Permittee should maintain a record of the procedures used to calibrate the pressure gauges used to read the differential static pressure across the baghouses. The QA/QC procedures should be established in the compliance monitoring plan prepared by the source.
- (c) The manufacturer's specifications include proper pressure gauge operating ranges and conditions, calibration procedure and recommended maintenance schedule. Condition D.2.10(b)(8) was removed.
- (d) As the vents are already directed to the atmosphere, OAM agrees to remove the statement "Documentation of the dates vents are redirected." The condition has been changed as follows:

~~(8) Documentation of the dates vents are redirected.~~

Comment 9:

In Condition D.2.10 of the permit, under the second (b) heading, please adjust the (b) to read (c) and adjust the subsequent lettering as appropriate.

Response 9:

The following changes have been made to Condition D.2.10 of the permit to correct the lettering:

- (bc) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (ed) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 10:

In Condition D.3.2 of the permit, please remove the requirements of a Preventive Maintenance Plan for the one propane storage tank since there is no control device on this facility.

Response 10:

The requirements to maintain a Preventive Maintenance Plan is applicable to any facility that is subject to the New Source Performance Standard and is required by 326 IAC 2-5.1 and 326 IAC 2-6.1, 326 IAC 2-7 and 326 IAC 2-8 to obtain a permit. Any preventive maintenance that could effect emissions from the facilities in question should be listed in the Preventive Maintenance Plan.

Comment 11:

In the TSD, the deliner chopper should have a limited potential to emit for particulate of 17.21 tons per year according to 326 IAC 6-3-2.

Response 11:

Page 6 of 8 of the TSD has been revised to correct the allowable 326 IAC 6-3-2 emissions from the deliner chopper. The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support materials that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The changes are as follows:

326 IAC 6-3-2 (Process Operations)

Pursuant to CP 059-2477-00012, issued on August 26, 1992 and CP 059-2668-00012, issued on October 21, 1992, the particulate matter (PM) from the two (2) shot blasting systems, the four (4) grinders, and the deliner chopper shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

UNIT	Process Weight Rate (tons per hour)	Allowable Emissions (pounds per hour)	Controlled Emissions (pounds per hour)
Two (2) shot blasting systems	0.70	3.23	0.42
Four (4) grinders	0.70	3.23	0.42
Deliner chopper	0.70 0.94	3.23 3.93	0.42

The baghouses shall be in operation at all times the two (2) shot blasting systems, the four (4) grinders, and the deliner chopper are in operation, in order to comply with this limit.

Page 4 of 8 of the TSD has also been revised to list the correct limited potential to emit for the emission units and the source. The changes to the TSD are as follows:

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
dip tank	0.00	0.00	0.00	34.87 8.09	0.00	0.00	4.40 1.03
two (2) shot blasting systems	14.15 (each)	1.86	0.00	0.00	0.00	0.00	0.00
four (4) grinders	14.15 (each)	7.42	0.00	0.00	0.00	0.00	0.00
deliner chopper	14.15 17.21	1.39	0.00	0.00	0.00	0.00	0.00
propane combustion units (insignificant activities)	0.04	0.04	0.01	0.05	0.20	1.51	0.00
Total Emissions	99.09 102.15	10.71	0.01	34.92 8.14	0.20	1.51	4.40 1.03

Limited Potential to Emit for PM emissions are based on 326 IAC 6-3 (Process Operations).

Comment 11:

The VOC emission calculation table contains incorrect data. The table should have the following data.

Density 7.95 lb/gal polyalkylene glycol
Weight % Volatile: 47%
Weight % Water: 0%
Weight % Organics 53%
Volume % Water: 0%
Volume % Non-Volatiles: NA
Gal of Mixture per hour: 1.929 gal/hr
25 percent of the Mixture is polyalkylene glycol
Pound VOC per gallon Coating less water: 3.74 lb VOC/gal
Pound VOC per gallon of coating: 3.73 lb VOC/gal
Potential VOC pounds per hour: 1.80 lb VOC/hr
Potential VOC pounds per day: 43.29 lb VOC/day
Potential VOC tons per year: 7.90 ton VOC/year
Particulate Potential tons per year: 0.00 tons/year
lb VOC/gal solids: NA
Transfer Efficiency: 100 percent

The HAP emission calculation table contains incorrect data. The table should have the following data:

Density: 7.95 lb/gal polyalkylene glycol
Gallons of Mixture per hour: 1.929 gal/hr
25 percent of the Mixture is polyalkylene glycol
Weight % Phenol: 5.3%
Wight % Formaldehyde: 1.0%
Phenol Emissions tons per year: 0.89 tons/yr
Formaldehyde Emissions tons per year: 0.17 tons/yr

Response 12:

The VOC and HAP emission calculation tables have been corrected to reflect the fact that acetone is not considered a HAP or VOC. The correct emissions using the MSDS submitted in the original application from this unit are:

VOC and Particulate

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. per hour (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Lb VOC/gal solids	Transfer Efficiency
Dip Tank	6.92	13.83 %	0.0%	13.8%	0.0%	NA	1.929	0.96	0.96	1.85	44.31	8.09	0.00	NA	100%

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

HAP Emission Calculations

Material	Density (Lb/Gal)	Gallons of Material per hour (gal/hr)	Weight % Phenol	Weight % Formaldehyde	Phenol Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)
Dip Tank	6.92	1.9	1.47%	0.29%	0.86	0.17

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
dip tank	0.00	0.00	0.00	34.87 8.09	0.00	0.00	4.40 1.03
two (2) shot blasting systems	14.15 (each)	1.86	0.00	0.00	0.00	0.00	0.00
four (4) grinders	14.15 (each)	7.42	0.00	0.00	0.00	0.00	0.00
deliner chopper	44.15 17.21	1.39	0.00	0.00	0.00	0.00	0.00
propane combustion units (insignificant activities)	0.04	0.04	0.01	0.05	0.20	1.51	0.00
Total Emissions	99.09 102.15	10.71	0.01	34.92 8.14	0.20	1.51	4.40 1.03

Limited Potential to Emit for PM emissions are based on 326 IAC 6-3 (Process Operations).

Comment 13:

The LPG-Propane-Commercial Boilers emission calculation table contains incorrect data. The table should have the following data:

Sulfur Content: 0.00 grains/100ft³
VOC Emission Factor: 0.47 lb/kgal

Response 13:

The emission factors for the LPG-Propane-Commercial Boilers emission calculation table have been corrected to reflect the Sulfur Content: 0.00 grains/100ft³ and a VOC Emission Factor: 0.47 lb/kgal. The correct emissions from this unit are:

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO ₂ Emission factor = 0.10 x S S = Sulfur Content =	0.00 grains/100ft ³
2.25	215.41		

Emission Factor in lb/kgal	Pollutant					
	PM 0.4	PM ₁₀ 0.4	SO ₂ 0.0 (0.10S)	NO _x 14.0	VOC 0.5 *TOC value	CO 1.9
Potential Emission in tons/yr	0.04	0.04	0.00	1.51	0.05	0.20

*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
(Source - AP-42 (Supplement B 10/96) page 1.5-3)
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu
Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-03-010-02)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit (additions indicated in **boldface**, deletions indicated by ~~strikeout~~ for emphasis):

Page 6 of 8 of the TSD has been changed to add noncompliance with 326 IAC 2-6 to the list of enforcement issues. The changes to the TSD page are as follows:

Enforcement Issue

- (a) IDEM is aware that the source is not in compliance with 326 IAC 2-7 (Part 70 Permit Program). The source has failed to submit a timely and complete Part 70 permit application no more than twelve (12) months after U.S. EPA's approval of the Part 70 program. The required submittal date was December 13, 1996.
- (b) **IDEM is aware that the source is not in compliance with 326 IAC 2-6 (Emission Reporting). The source has the potential to emit more than one hundred (100) tons per year of PM-10 and has failed to annually submit an emission statement for the source.**
- (bc) IDEM is reviewing this matter and has taken appropriate action. The compliance schedule in this proposed permit will satisfy the requirements of the above stated requirements.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: D & D Brake Sales, Inc.
Source Location: State Road 234 and Mohawk Road, Fortville, Indiana 46040
County: Hancock
SIC Code: 3069, 7539
Operation Permit No.: T059-9982-00012
Permit Reviewer: Yvette de los Angeles/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from D & D Brake Sales, Inc. relating to the operation of a brake shoe manufacturing facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) Wheelabrator shot blasting systems, identified as #1 and 2, each constructed in 1992, each with a maximum capacity of blasting 700 pounds of brake shoes per hour, both utilizing one (1) baghouse (ID #1) for particulate control, exhausting through one (1) stack ID # 1;
- (b) Four (4) grinders, identified as # 1, 2, 3, and 4, each constructed in 1992, each with a maximum grinding rate of 350 pounds per hour, all utilizing one (1) baghouse (ID #2) and a HEPA filter for particulate control, exhausting through one (1) stack ID #2;
- (c) One (1) deliner chopper, constructed in 1992, with a maximum throughput capacity of 1,875 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3;
- (d) Two (2) dip tanks, identified as primary and secondary, each constructed in 1992, with a maximum throughput rate of 4 gallons per hour. The secondary dip tank is only used when the primary dip tank is not working; and
- (e) One (1) propane storage tank, identified as #1, constructed in 1992, with a maximum storage capacity of 15,042 gallons.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million British thermal units (MMBtu) per hour:

- (1) One (1) burnoff oven, constructed in 1992, with a maximum heat input rate of 0.75 MMBtu per hour, exhausting through stack ID # 7;
 - (2) Three (3) bonding ovens, identified as #1, 2, and 3, each constructed in 1992, each with a maximum heat input rate of 0.5 MMBtu per hour, each exhausting through stacks # 5, 4, and 6, respectively;
- (b) Vessel storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (e) Paved and unpaved roads and parking lots with public access; and
- (f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting, pneumatic conveying, and woodworking activities.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP-059-2477-00012, issued on August 26, 1992; and
- (b) CP-059-2668-00012, issued on October 21, 1992.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP-059-2477-00012, issued on August 26, 1992
 - (1) Operation Condition 4: That particulate matter (PM) emissions shall be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 20% opacity.

Reason not incorporated: Facilities that discharge asbestos have opacity limitation standards pursuant to 326 IAC 14-2-1, (40 CFR 61.140, Subpart M). Therefore, there is no need to place a separate opacity limitation on the grinding and shotblasting operations.
- (b) CP-059-2668-00012, issued on October 21, 1992
 - (1) Operating Condition 4: That particulate matter (PM) emissions shall be limited to 0.015 grains per actual cubic foot (gr/acf) at the outlet of the fan discharge for the dust collectors for the grinding and the shotblasting operations. PM emissions will be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 10% opacity.

Reason not incorporated: Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Facilities that discharge asbestos have opacity limitation standards pursuant to 326 IAC 14-2-1, (40 CFR 61.140, Subpart M). Therefore, there is no need to place a separate opacity limitation on the grinding and shotblasting operations.

- (2) Operating Condition 5: That volatile organic compound (VOC) emissions from the dip tank shall be limited to 15 pounds per day.

Reason not incorporated: The secondary dip tank will only be used if the primary dip tank is not in use. Both tanks shall be subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating).

Enforcement Issue

- (a) IDEM is aware that the source is not in compliance with 326 IAC 2-7 (Part 70 Permit Program). The source has failed to submit a timely and complete Part 70 permit application no more than twelve (12) months after U.S. EPA's approval of the Part 70 program. The required submittal date was December 13, 1996.
- (b) IDEM is reviewing this matter and has taken appropriate action. The compliance schedule in this proposed permit will satisfy the requirements of the above stated requirement.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on July 13, 1998.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (three (3) pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Formaldehyde	less than 10
Phenol	less than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
dip tank	0.00	0.00	0.00	34.87	0.00	0.00	1.10
two (2) shot blasting systems	14.15 (each)	1.86	0.00	0.00	0.00	0.00	0.00
four (4) grinders	14.15 (each)	7.42	0.00	0.00	0.00	0.00	0.00
deliner chopper	14.15	1.39	0.00	0.00	0.00	0.00	0.00

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
propane combustion units (insignificant activities)	0.04	0.04	0.01	0.05	0.20	1.51	0.00
Total Emissions	99.09	10.71	0.01	34.92	0.20	1.51	1.10

Limited Potential to Emit for PM emissions are based on 326 IAC 6-3 (Process Operations).

County Attainment Status

The source is located in Hancock County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Hancock County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The one (1) tank, constructed in 1992, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.60.110, Subpart Kb) because the storage capacity of the one (1) tank is 57 cubic meters, which is greater than 40 cubic meters. Pursuant to Subpart Kb, each storage vessel with a design capacity of less than 75 cubic meters shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14-2-1, (40 CFR 61.140, Subpart M) because the lining of the brake shoes are made of asbestos. Pursuant to CP 059-2477-00012, issued on August 26, 1992 and CP 059-2668-00012, issued on October 21, 1992, the following requirements of this subpart shall be met:
- (1) Each owner or operator shall discharge no visible emissions to the outside air from these operations or from any building or structure in which they are conducted.
 - (2) Monitoring each potential source of asbestos emissions from visible emissions at least once a day.
 - (3) Inspecting each air cleaning device at least once each week for proper operation.

- (4) Maintaining records of monitoring and inspections using a format similar to Figure 1 and 2 in 40 CFR 61.140, Subpart M.
- (5) Furnishing upon request and/or making available the records for inspection by OAM.
- (6) Retaining a copy of all monitoring and inspection records for at least two years.
- (7) Submitting a copy of the monitoring records if visible emissions occurred during the report period.
- (8) Meeting the waste disposal requirements.
- (9) Meeting the requirements of Section 61.152 (Air Cleaning) and 61.153 (Reporting).

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 because it is not one of the 28 listed source categories and the potential to emit of all regulated pollutants, after controls, is less than 250 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to CP 059-2477-00012, issued on August 26, 1992 and CP 059-2668-00012, issued on October 21, 1992, the particulate matter (PM) from the two (2) shot blasting systems, the four (4) grinders, and the deliner chopper shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

UNIT	Process Weight Rate (tons per hour)	Allowable Emissions (pounds per hour)	Controlled Emissions (pounds per hour)
Two (2) shot blasting systems	0.70	3.23	0.42
Four (4) grinders	0.70	3.23	0.42
Deliner chopper	0.70	3.23	0.42

The baghouses shall be in operation at all times the two (2) shot blasting systems, the four (4) grinders, and the deliner chopper are in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at each of the dip tanks shall be limited to 4.3 pounds of VOCs per gallon of coating less water, for clear coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the dip tanks are in compliance with this requirement.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The one (1) tank is not subject to 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities) because the tank capacity is less than 39,000 gallons.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The one (1) tank is not subject to 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because the tank is located in Hancock County.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The two (2) shot blasting systems, the four (4) grinders and the deliner chopper has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the two (2) shot blasting systems, the four (4) grinders and the deliner chopper shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouses controlling the two (2) shot blasting systems, the four (4) grinders and the deliner chopper, at least once daily when the two (2) shot blasting systems, the four (4) grinders and the deliner chopper are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each of the baghouses shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses for the two (2) shot blasting systems, the four (4) grinders and the deliner chopper must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (see Appendix A, page 1 of 3).

Conclusion

The operation of this brake shoe manufacturing facility shall be subject to the conditions of the attached proposed **Part 70 Permit No. T059-9982-00012**.

**Appendix A: Emissions Calculations
From Surface Coating Operations**

Page 1 of 3 TSD App A

Company Name: D & D Brake Sales, Inc.
Address City IN Zip: State Road 234 and Mohawk Road, Fortville, IN 46040
CP: 059-9982
Plt ID: 059-00012
Reviewer: Yvette de los Angeles/EVP
Date: 06/27/2000

VOC and Particulate

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. per hour (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Dip Tank	7.00	59.86%	0.0%	59.9%	0.0%	NA	4.0	4.19	4.19	16.76	402.26	73.41	0.00	NA	100%

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

HAP Emission Calculations

Material	Density (Lb/Gal)	Gallons of Material per hour (gal/hr)	Weight % Phenol	Weight % Formaldehyde	Phenol Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)
Dip Tank	7.00	1.9	1.60%	0.30%	0.93	0.17

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Process Particulate Emissions

Company Name: D & D Brake Sales, Inc.
Address City IN Zip: State Road 234 and Mohawk Road, Fortville, IN 46040
CP: 059-9982
Plt ID: 059-00012
Reviewer: Yvette de los Angeles/EVP
Date: 06/27/2000

State Potential Emissions (tons/year)						
A. Baghouses						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
Shotblast #1 and 2	2	0.01000	1.3	1,854	99.85%	1,238.91
Grinders #1, 2, 3, and 4	4	0.01000	4.0	1,236	99.97%	24,748.25
Deliner Chopper	1	0.01000	3.0	1,236	99.85%	928.06
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						26,915.23
Federal Potential Emissions (tons/year)						
A. Baghouses						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
Shotblast #1 and 2	2	0.01000	1.3	1,854	99.85%	1.86
Grinders #1, 2, 3, and 4	4	0.01000	4.0	1,236	99.97%	7.42
Deliner Chopper	1	0.01000	3.0	1,236	99.85%	1.39
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls						10.67

Methodology:State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs

Appendix A: Emission Calculations
LPG-Propane - Commercial Boilers
(Heat input capacity: > 0.3 MMBtu/hr and < 10 MMBtu/hr)

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Company Name: D & D Brake Sales, Inc.
Address City IN Zip: State Road 234 and Mohawk Road, Fortville, IN 46040
CP: 059-9982
Plt ID: 059-00012
Reviewer: Yvette de los Angeles/EVP
Date: 06/27/2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

SO2 Emission factor = 0.10 x S

S = Sulfur Content = 1.00 grains/100ft³

2.25

215.41

Emission Factor in lb/kgal	Pollutant					
	PM 0.4	PM10 0.4	SO2 0.1 (0.10S)	NOx 14.0	VOC 0.5 *TOC value	CO 1.9
Potential Emission in tons/yr	0.04	0.04	0.01	1.51	0.05	0.20

*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-3)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-03-010-02)

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton